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VIA ECF

February 17, 2023

Hon. Katharine H. Parker  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, NY 10007

Esha Bandyopadhyay  
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**Re: *Spectrum Dynamics Medical Limited (Plaintiff) v. GE et al. (Defendants);*  
Case No.: 18-cv-11386 (VSB)**

Dear Judge Parker:

Pursuant to Federal Rule of Civil Procedure 5.2(e), Your Honor's Individual Rule of Practice III(d), and the parties' Stipulated Protective Order (ECF No. 156), Spectrum respectfully requests (1) redaction and filing under seal of its Second Amended Complaint and Exhibits 20 and 25 thereto and (2) filing under seal of Exhibits 2-18 and 28-29.

Like its First Amended Complaint and Exhibits 20 and 25 thereto, Spectrum's Second Amended Complaint and Exhibits 20 and 25 thereto (1) describe the trade secrets that Spectrum alleges GE misappropriated; (2) reference the GE patents, by number and other identifying information, that Spectrum alleges contain its misappropriated trade secrets; and (3) point to specific figures and text in those GE patents that Spectrum alleges disclose its misappropriated trade secrets. Judge Broderick previously granted Spectrum's request to redact such information from its First Amended Complaint and Exhibits 20 and 25 thereto. ECF No. 32 at 1-2. Judge Broderick also granted Spectrum's request to redact such information from its Motion for Leave to Amend Complaint. ECF No. 552.

Exhibits 2-18 and 28 to Spectrum's Second Amended Complaint are copies of the GE patents that Spectrum alleges contain its misappropriated trade secrets. Judge Broderick previously granted Spectrum's requests to file these patents under seal. ECF No. 32; ECF No. 552.

Finally, Exhibit 29 to Spectrum's Second Amended Complaint is a copy of Spectrum's Amended Second Supplemental Table of Trade Secrets (ECF No. 613-1). Your Honor previously granted Spectrum's request to file that document under seal. ECF No. 614.

For these reasons, Spectrum respectfully requests that the Court grant its request to file its Second Amended Complaint and Exhibits 20 and 25 thereto under seal and in redacted form, and to file Exhibits 2-18 and 28-29 under seal.



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Respectfully Submitted,

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*Spectrum Dynamics Medical Limited*

Spectrum's proposed redactions are narrowly tailored to protect trade secrets and other competitively sensitive information in accordance with *Lugosch v. Pyramid Co. of Onandaga*, 435 F.3d 110 (2d Cir. 2006) and its progeny. Accordingly, the motion is GRANTED and the document filed at ECF No. 630 may remain under seal.

**SO ORDERED:**

A handwritten signature in black ink that reads "Katharine H. Parker". The signature is written in a cursive, flowing style.

**HON. KATHARINE H. PARKER**  
**UNITED STATES MAGISTRATE JUDGE** 2/21/2023

cc: All counsel of record (via ECF)